

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI  
ABERDEEN DIVISION**

IN RE: TIMOTHY WOOD  
KIMBERLY WOOD

CASE NO.:19-14516-JDW  
CHAPTER 13

**OBJECTION TO CONFIRMATION OF AMENDED CHAPTER 13 PLAN**

COMES NOW, Wells Fargo Bank, N.A. and files this Objection to Confirmation of Amended Plan, and in support thereof would show the following:

1. Creditor is the assignee of a Deed of Trust, signed by Debtor, which was recorded in DK T Book 3,153 at Page 296, in the office of the Chancery Clerk of Desoto County, Mississippi.

2. The property at issue in this case is located at 560 RIDGE VIEW S, HERNANDO, MS 38632-7589.

3. The Amended Plan (Dk#10) filed by the Debtor lists Creditor as a home mortgage secured claimant, but the Amended Plan incorrectly reflects the amount of arrearage due on the loan associated with the above referenced Deed of Trust

4. Creditor is due ongoing mortgage payments, as well as arrearage payments, which is listed on the Proof of Claim (Claim#8) filed in this bankruptcy case.

5. Creditor is a secured creditor, and cannot adequately protect its rights under the terms of the Amended Plan (Dk#10) filed by the Debtor.

6. For good and valid reasons to be shown at the hearing on this Objection to Confirmation of Amended Plan.

WHEREFORE, PREMISES CONSIDERED, Creditor, respectfully requests confirmation of the Amended Plan (Dk#10) filed by the Debtor be denied.

Respectfully submitted, this 5th day of December 2019.

Dean Morris, LLC  
1820 Avenue of America  
Monroe, LA 71201  
(318) 330-9020

**/s/ Kimberly D. Putnam**  
Kimberly D. Putnam (Bar# 102418)  
kim.mackey@ms.creditorlawyers.com  
ATTORNEY FOR MOVANT

**CERTIFICATE OF SERVICE**

I, Kimberly D. Putnam, hereby certify that I have notified all interested parties of the Objection to Confirmation of Amended Chapter 13 Plan filed by Creditor, who are listed as follows:

Timothy Wood  
Kimberly Wood  
560 RIDGE VIEW S  
HERNANDO, MS 38632-7589

Robert H. Lomenick, Jr.  
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Office of U.S. Trustee  
USTPRegion05.AB.ECF@usdoj.gov

by electronic transmission or by mailing a copy of the Objection to Confirmation to Amended Chapter 13 Plan filed herein by United States Mail, first class, postage prepaid and properly addressed, all on this 5th day of December 2019.

Dean Morris, LLC  
1820 Avenue of America  
Monroe, LA 71201  
(318) 330-9020

**/s/ Kimberly D. Putnam**  
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